

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	
	§	
JOE JESSE MONGE and	§	
ROSANA ELENA MONGE,	§	CASE NO. 09-30881-lmc
	§	
Debtors.	§	
	§	
JOE JESSE MONGE and	§	CHAPTER 11
ROSANA ELENA MONGE,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	ADVERSARY NO. 10-3019
ALICIA ROJAS and FRANCISCO JAYME,	§	
	§	
Defendants.	§	

JOINT STIPULATION EXTENDING ALL DEADLINES AND
JOINT MOTION FOR CONTINUANCE OF DOCKET CALL FOR TRIAL

COME NOW JOE JESSE MONGE and ROSANA ELENA MONGE (“Plaintiffs”), Plaintiffs herein, joined by ALICIA ROJAS and FRANCISCO JAYME (“Defendants”), Defendants herein, and file this their Joint Stipulation Extending all Deadlines and Moving for Continuance of the Docket Call for Trial, and as grounds therefor state:

1.

The deadlines established in the above-captioned case provide that discovery be completed by 9/28/10, that dispositive motions be filed by 10/13/10, and that the pretrial order be submitted by 11/26/10. Docket call for trial is scheduled for 12/1/10 at 3:00 p.m.

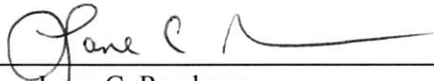
2.

Defendants filed an amended counterclaim approximately one (1) month ago and immediately sent written discovery to Plaintiffs. Responses to this written discovery are due within a few days. This amended counterclaim added several claims and theories to the case. The parties have proceeded to investigate the

alleged facts of this case, and both Plaintiffs and Defendants believe that additional discovery will be beneficial. The parties therefore jointly stipulate that all of the deadlines in this case be extended for a period of ninety (90) days to allow for the parties fully to develop the facts and to obtain documents, potentially from third parties. Such an extension of ninety (90) days will require that the docket call for trial be continued, and the parties therefore jointly move that the docket call for trial be continued to all for the said extension.

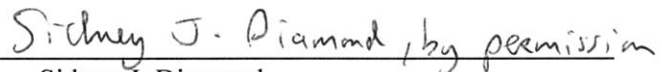
Respectfully submitted,

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